IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF INDIANA SOUTH BEND DIVISION

ROMAN FINNEGAN, et al.,)		
)		
Plaintiffs,)		
)		
V .)	NO.	3:08-CV-503
)		
LAUREL MYERS, et al.,)		
)		
Defendants,)		

VERDICT FORM

Circle YES or NO for each defendant

FIRST AMENDMENT - RIGHT TO PETITION THE GOVERNMENT

Do you find in favor of Plaintiff Lynnette Finnegan and against

- Laurel Myers? YES / NO
- James Payne? YES / NO
- Regina McAninch? YES / NO

Do you find in favor of Plaintiff Roman Finnegan and against

- Laurel Myers? (TES / NO
- James Payne? YES / NO
- Regina McAninch? YES /(NO)

DECEMBER 20, 2005: PULASKI COUNTY OFFICE OF DCS

(JOHNATHON ABAIR, TABITHA ABAIR, AND KATELYNN SALYER)

Do you find in favor of Plaintiff Lynnette Finnegan and against

- Laurel Myers? (YES) / NO
- Regina McAninch? (ES) / NO
- Tracy Salyers? YES / NO

Do you find in favor of Plaintiff Roman Finnegan and against

- Laurel Myers? (YES) / NO
- Regina McAninch? YES / NO
- Tracy Salyers? YES / (NO)

Do you find in favor of Plaintiff Tabitha Abair and against

- Laurel Myers? (YES) / NO
- Regina McAninch? (ES)/ NO
- Tracy Salyers? YES / NO

Do you find in favor of Plaintiff Katelynn Salyer and against

- Laurel Myers? (YES) / NO
- Regina McAninch? (YES)/ NO
- Tracy Salyers? YES / (NO)

Do you find in favor of Plaintiff Johnathon Abair and against

- Laurel Myers? (YE) / NO
- Regina McAninch? YES / NO
- Tracy Salyers? YES / (NO)

NOVEMBER 2006 REMOVAL OF TABITHA ABAIR AND KATELYNN SALYER

Do you find in favor of Plaintiff Lynnette Finnegan and against

- Laurel Myers? (YES)/ NO
- James Payne? YES / (NO
- Regina McAninch? (YES / NO
- Tracy Salyers? YES/(NO)
- Antoinette Laskey? YES /(NO

Do you find in favor of Plaintiff Roman Finnegan and against

- Laurel Myers? YES / NO
- James Payne? YES / (NO)
- Regina McAninch? (YES / NO
- Tracy Salyers? YES/NO
- Antoinette Laskey? YES / NO

Do you find in favor of Plaintiff Tabitha Abair and against

- Laurel Myers? (YES / NO
- James Payne? YES /(NO)
- Regina McAninch? (YES / NO
- Tracy Salyers? YES/(NO)
- Antoinette Laskey? YES NO

Do you find in favor of Plaintiff Katelynn Salyer and against

- Laurel Myers? (YES)/ NO
- James Payne? YES (NO)

- Regina McAninch? (YES) / NO
- Tracy Salyers? YES/NO
- Antoinette Laskey? YES / NO

JANUARY 2007 SEARCH OF FINNEGAN HOME

Do you find in favor of Plaintiff Lynnette Finnegan and against

• Jennifer McDonald? YES / NO

Do you find in favor of Plaintiff Roman Finnegan and against

• Jennifer McDonald? YES / (NO)

FOURTH AMENDMENT -SEARCH AND SEIZURE

JANUARY 2007 EXHUMATION OF JESSICA SALYER'S BODY

Do you find in favor of Plaintiff Lynnette Finnegan and against

- Jennifer McDonald? YES / NO
- James Payne? YES/NO

Do you find in favor of Plaintiff Roman Finnegan and against

- Jennifer McDonald? YES / NO
- James Payne? YES (NO

FOURTH AMENDMENT -SEARCH AND SEIZURE

APRIL 24, 2007 ARREST OF ROMAN AND LYNNETTE FINNEGAN

Do you find in favor of Plaintiff Lynnette Finnegan and against

• Jennifer McDonald? YES / NO

Do you find in favor of Plaintiff Roman Finnegan and against Jennifer McDonald? YES / (NO)

FOURTEENTH AMENDMENT - PROCEDURAL DUE PROCESS

Do you find in favor of Plaintiff Lynnette Finnegan and against

- Laurel Myers? YES / NO
- James Payne? YES /(N)
- Regina McAninch? (YES / NO
- Tracy Salyers? YES / (NO)
- Reba James? (YES)/ NO
- Jennifer McDonald? YES / NO
- Antoinette Laskey? (YES) / NO

Do you find in favor of Plaintiff Roman Finnegan and against

- Laurel Myers? (YES) / NO
- James Payne? YES / (NO)
- Regina McAninch? (YES) / NO
- Tracy Salyers? YES / (NO)
- Reba James? (ES)/ NO
- Jennifer McDonald? (TES) / NO
- Antoinette Laskey? (YES) / NO

Do you find in favor of Plaintiff Tabitha Abair and against

- Laurel Myers? YES / NO
- James Payne? YES / NO
- Regina McAninch? (YES) / NO
- Tracy Salyers? YES / NO
- Reba James? YES (NO)

- Jennifer McDonald? YES / NO
- Antoinette Laskey? YES / NO

Do you find in favor of Plaintiff Katelynn Salyer and against

- Laurel Myers? (YES) / NO
- James Payne? YES / (NO)
- Regina McAninch? (YES) / NO
- Tracy Salyers? YES / NO
- Reba James? YES / NO
- Jennifer McDonald? YES (NO
- Antoinette Laskey? YES / (NO

Do you find in favor of Plaintiff Johnathon Abair and against

- Laurel Myers? (YES)/ NO
- James Payne? YES / NO
- Regina McAninch? (YES) / NO
- Tracy Salyers? YES / NO
- Reba James? YES (NO
- Jennifer McDonald? (YES) NO
- Antoinette Laskey? YES / NO

FOURTEENTH AMENDMENT - SUBSTANTIVE DUE PROCESS (FAMILIAL RELATIONS)

Do you find in favor of Plaintiff Lynnette Finnegan and against

- Laurel Myers? (YES) NO
- James Payne? YES NO
- Regina McAninch? YES / NO
- Tracy Salyers? YES / NO
- Reba James? YES / NO
- Jennifer McDonald? YES / (NO
- Antoinette Laskey? YES / (NO

Do you find in favor of Plaintiff Roman Finnegan and against

- Laurel Myers? (YES) / NO
- James Payne? YES / (NO)
- Regina McAninch? YES /(NO
- Tracy Salyers? YES / NO
- Reba James? YES (NO)
- Jennifer McDonald? YES /NO
- Antoinette Laskey? YES /(NO)

Do you find in favor of Plaintiff Tabitha Abair and against

- Laurel Myers YES / NO
- James Payne? YES NO
- Regina McAninch? YES (NO)
- Tracy Salyers? YES / NO
- Reba James? YES / NO

- Jennifer McDonald? YES / NO
- Antoinette Laskey? YES / NO

Do you find in favor of Plaintiff Katelynn Salyer and against

- Laurel Myers? YE2 / NO
- James Payne? YES /(NO)
- Regina McAninch? YES / (NO)
- Tracy Salyers? YES / NO
- Reba James? YES / NO
- Jennifer McDonald? YES / (NO)
- Antoinette Laskey? YES / NO

Do you find in favor of Plaintiff Johnathon Abair and against

- Laurel Myers? (YES / NO
- James Payne? YES /(NO)
- Regina McAninch? YES / NO
- Tracy Salyers? YES /(NO
- Reba James? YES (NO)
- Jennifer McDonald? YES / NO
- Antoinette Laskey? YES NO

If you circled NO as to each defendant for all claims, STOP here and go to the end of this packet and sign and date the Verdict Form. If you have answered YES to any of the defendants for any claim, please proceed to answer the questions of damages as it applies.

COMPENSATORY DAMAGES

If you have found in favor of any of the plaintiffs, on any of their claims against any of the defendants, you must determine what amount of compensatory damages, if any, they are entitled to receive. If you have found in favor of any of the plaintiffs, but find that the plaintiff has not proved compensatory damages, you must return a verdict for that plaintiff in the amount of \$1.00.

If you find a plaintiff is not entitled to recover compensatory damages as to a defendant, write the word "zero" in the blank.

FIRST AMENDMENT-RIGHT TO PETITION THE GOVERNMENT

claim of a violation of the ri the First Amendment, to \$\bullet\$ 625,000	Lynnette Finnegan's damages on the ght to petition the government under be in the total amount of dollars against each defendant as
follows:	
	Laurel Myers
-0-(Zeeo)	James Payne
- 0 - (Zero)	Regina McAninch
of a violation of the right t First, Amendment, to be	oman Finnegan's damages on the claim o petition the government under the in the total amount of dollars against each defendant as
\$ 625,000	Laurel Myers
-0- (ZeRO)	James Payne
- 0-(Zero)	Regina McAninch

DECEMBER 20, 2005: PULASKI COUNTY OFFICE OF DCS

(JOHNATHON ABAIR, TABITHA ABAIR, AND KATELYNN SALYER)

We, the jury, find Plaintiff Lynnette Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizure under the Fourth Amendment, as a result of the childred being taken to the Pulaski County Office of DCS on December 20 2005, to be in the total amount of 100,000 dollars against each defendant as follows: 150,000		
Regina McAninch Zero Tracy Salyers We, the jury, find Plaintiff Roman Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizur under the Fourth Amendment, as a result of the children being take to the Pulaski County Office of DCS on December 20, 2005, to be in the total amount of 100,000 dollar against each defendant as follows: ### 50,000 Laurel Myers ### 50,000 Regina McAninch	claim of a violation of the seizure under the Fourth Amer being taken to the Pulaski Co 2005, to be in the total amount	right to be free from unreasonable adment, as a result of the children bunty Office of DCS on December 20, at of
We, the jury, find Plaintiff Roman Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizur under the Fourth Amendment, as a result of the children being take to the Pulaski County Office of DCS on December 20, 2005, to be in the total amount of	# 50,000	Laurel Myers
We, the jury, find Plaintiff Roman Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizur under the Fourth Amendment, as a result of the children being take to the Pulaski County Office of DCS on December 20, 2005, to be in the total amount of	\$ 50,000	Regina McAninch
of a violation of the right to be free from unreasonable seizur under the Fourth Amendment, as a result of the children being take to the Pulaski County Office of DCS on December 20, 2005, to be in the total amount of 100,000 dollar against each defendant as follows: ### 50,000 Laurel Myers ### 50,000 Regina McAninch	Zero	Tracy Salyers
# 50,000 Regina McAninch	of a violation of the right t under the Fourth Amendment, as to the Pulaski County Office of the total amount of	o be free from unreasonable seizure a result of the children being taken of DCS on December 20, 2005, to be in dollars
70.0	\$ 50,000	Laurel Myers
Zeko Tracy Salyers	\$ 50,000	Regina McAninch
	Zero	Tracy Salyers
We, the jury, find Plaintiff Johnathon Abair's damages on the claim of a violation of the right to be free from unreasonable seizur under the Fourth Amendment, as a result of the children being take to the Pulaski County Office of DCS on December 20, 2005, to be in the total amount of	of a violation of the right tunder the Fourth Amendment, as to the Pulaski County Office of the total amount of	o be free from unreasonable seizure a result of the children being taken of DCS on December 20, 2005, to be in dollars
# 75,000 Laurel Myers	\$ 75,000	Laurel Myers
	# 75,000	Regina McAninch

Zero	Tracy Salyers
of a violation of the right tunder the Fourth Amendment, as	Tatelynn Salyer's damages on the claim to be free from unreasonable seizure a result of the children being taken of DCS on December 20, 2005, to be in dollars lows:
\$75,000	Laurel Myers
\$75,000	Regina McAninch
Zero	Tracy Salyers
of a violation of the right tunder the Fourth Amendment, as to the Pulaski County Office	Tabitha Abair's damages on the claim to be free from unreasonable seizure a result of the children being taken of DCS on December 20, 2005, to be in dollars lows:
\$75,000	Laurel Myers
# 75,000	Regina McAninch
Zero	Tracy Salyers
	NT -SEARCH AND SEIZURE
NOVEMBER 2006 REMOVAL OF	Tabitha Abair and Katelynn Salyer
claim of a violation of the seizure under the Fourth Ame	Lynnette Finnegan's damages on the right to freedom from unreasonable ndment, as a result of the November and Katelynn Salyer, to be in the dollars against each
#750,000	Laurel Myers
Zero \$\frac{1}{250,000}	James Payne
\$ 250,000	Regina McAninch

Zero	Tracy Salyers
Zero	Antoinette Laskey
of a violation of the right under the Fourth Amendment,	Roman Finnegan's damages on the claim to freedom from unreasonable seizure as a result of the November 2006 Katelynn Salyer, to be in the total dollars against each
\$ 175,000	Laurel Myers
Zero	James Payne
\$ 75,000	Regina McAninch
2ero	Tracy Salyers
Zero	Antoinette Laskey
of a violation of the right under the Fourth Amendment, removal of Tabitha Abair and	Tabitha Abair's damages on the claim to freedom from unreasonable seizure as a result of the November 2006 Katelynn Salyer, to be in the total dollars against each
\$ 1,500,000	Laurel Myers
Zero	James Payne
# 500,000	Regina McAninch
# 500,000 Zero Zero	Tracy Salyers
Zero	Antoinette Laskey

of a violation of the right under the Fourth Amendment,	Katelynn Salyer's damages on the claim to freedom from unreasonable seizure as a result of the November 2006 Katelynn Salyer, to be in the total dollars against each	
\$ 1,500,000	Laurel Myers	
# 1500,000 Zero	James Payne	
\$ 500,000	Regina McAninch	
Zero	Tracy Salyers	
Zero	Antoinette Laskey	
FOURTH AMENDMENT -SEARCH AND SEIZURE JANUARY 2007 SEARCH OF FINNEGAN HOME		
claim of a violation of the search under the Fourth Amend		
	Roman Finnegan's damages on the claim to be free from unreasonable search	

JANUARY 2007 EXHUMATION OF JESSICA SALYER'S BODY

We, the jury, find Plaintiff Lynnette Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizure under the Fourth Amendment, as a result of the January 2007 exhumation of Jessica Salyer's body, to be in the total amount of dollars against each defendant as follows:
ZeRo Jennifer McDonald ZeRo James Payne
We, the jury, find Plaintiff Roman Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizure under the Fourth Amendment, as a result of the January 2007 exhumation of Jessica Salyer's body, to be in the total amount of dollars against each defendant as follows:
Zeko Jennifer McDonald Zeko James Payne
James Payne
FOURTH AMENDMENT -SEARCH AND SEIZURE
APRIL 24, 2007 ARREST OF ROMAN AND LYNNETTE FINNEGAN
We, the jury, find Plaintiff Lynnete Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizure under the Fourth Amendment, as a result of the April 24, 2007 arrest of Lynnette Finnegan, as a result of the actions of Jennifer McDonald, to be in the total amount of dollars.
We, the jury, find Plaintiff Roman Finnegan's damages on the claim of a violation of the right to be free from unreasonable seizure under the Fourth Amendment, as a result of the April 24, 2007 arrest of Roman Finnegan, as a result of the actions of Jennifer McDonald, to be in the total amount of dollars.

FOURTEENTH AMENDMENT - PROCEDURAL DUE PROCESS

		Lynnette Finnegan's damages on the edural Due Process rights under the
	h Amendment, to	be in the total amount of dollars against each defendant as
follows:		
#	2,250,000	Laurel Myers
	Zero	James Payne
	\$ 725,000	Regina McAninch
	ZERO	Tracy Salyers
	\$ 23,000	Reba James
	\$ 1,000	Jennifer McDonald
	\$1,000	Antoinette Laskey
of a vio	plation of Procedur	Roman Finnegan's damages on the claim ral Due Process rights under the be in the total amount of dollars against each
_4	3,750,000	Laurel Myers
***************************************	ZERO	James Payne
#	1,225,000	Regina McAninch
	ZERO	Tracy Salyers
	\$ 23,000	Reba James
_4	£ 1,000	Jennifer McDonald
	\$ 1,000	Antoinette Laskey

of a violation of Procedur Fourteenth Amendment, to	Tabitha Abair's damages on the claim ral Due Process rights under the be in the total amount of dollars against each defendant
# 75,000	Laurel Myers
Zero	James Payne
\$ 25,000	Regina McAninch
Zero	Tracy Salyers
Zero	Reba James
ZeRo	Jennifer McDonald
Zero	Antoinette Laskey
We, the jury, find Plaintiff Katelynn Salyer's damages on the claim of a violation of Procedural Due Process rights under the Fourteenth Amendment, to be in the total amount of dollars against each defendant as follows:	
\$ 35,000	Laurel Myers
Zero	James Payne
\$ 15,000	Regina McAninch
Zero	Tracy Salyers
Zero	Reba James
ZERO	Jennifer McDonald
7080	Antoinette Laskey

	Johnathon Abair's damages on the claim ural Due Process rights under the be in the total amount of dollars against each defendant as
follows:	dollars against each delendant as
\$ 35,000	Laurel Myers
ZERO	James Payne
# 14,000	Regina McAninch
Zero	Tracy Salyers
Zero	Reba James
# 1,000	Jennifer McDonald
Zero	Antoinette Laskey
claim of a violation of Sub:	antive Due Process (Familial Relations) If Lynnette Finnegan's damages on the stantive Due Process rights under the be in the total amount of dollars against each defendant as
# 3,000,000	Laurel Myers
ZERO	James Payne
ZERD	Regina McAninch
Zero	Tracy Salyers
Zero	Reba James
ZeRo	Jennifer McDonald
21RD	Antoinette Laskev

of a violation of Substant Fourteenth, Amendment, to	Roman Finnegan's damages on the claim rive Due Process rights under the be in the total amount of dollars against each defendant
#3,000,000	Laurel Myers
Zero	James Payne
ZeRo	Regina McAninch
Zero	Tracy Salyers
Zero	Reba James
ZeRo	Jennifer McDonald
Zero	Antoinette Laskey
We, the jury, find Plaintiff Tabitha Abair's damages on the claim of a violation of Substantive Due Process rights under the Fourteenth Amendment, to be in the total amount of dollars against each defendant as follows:	
\$ 3,000,000	Laurel Myers
ZERO	James Payne
Zero	Regina McAninch
Zero	Tracy Salyers
Zero	Reba James
Zero	Jennifer McDonald
ZERD	Antoinette Laskey

of a violation of Substant Fourteenth Amendment, to	Catelynn Salyer's damages on the claim cive Due Process rights under the be in the total amount of dollars against each defendant as	
\$3,000,000	Laurel Myers	
Zero	James Payne	
Zero Zero	Regina McAninch	
Zeeo	Tracy Salyers	
Zero	Reba James	
Zero	Jennifer McDonald	
ZeRo	Antoinette Laskey	
We, the jury, find Plaintiff Johnathon Abair's damages on the claim of a violation of Substantive Due Process rights under the Fourteenth Amendment, to be in the total amount of dollars against each defendant as follows:		
\$3,000,000	Laurel Myers	
ZERD	James Payne	
Zeko	Regina McAninch	
Zero	Tracy Salyers	
Zero	Reba James	
Zero \$1,000,000	Jennifer McDonald	
Zerb	Antoinette Laskey	

PUNITIVE DAMAGES

To the extent you have awarded damages to one of the plaintiffs on any of his or her claims against any of the defendants, you may, but are not required to, award that plaintiff punitive damages, in addition to the actual damages already determined.

If you find a plaintiff is not entitled to recover punitive damages as to a defendant, write the word "zero" in the blank.

PLAINTIFF LYNNETTE FINNEGAN

We, the jury, further find that Plaintiff Lynnette Finnegan is entitled to punitive damages in the total amount of dollars against each defendant as follows:

3ero	Laurel Myers
3 ero	James Payne
3 ero	Regina McAninch
3 ero	Tracy Salyers
Bero	Reba James
- Zero	Jennifer McDonald
340	Antoinette Laskey

PLAINTIFF ROMAN FINNEGAN

We, the jury, further find that Plaintiff Roman Finnegan is entitled to punitive damages in the total amount of dollars against each defendant as follows:

120	Laurel Myers
Zero	James Payne
Zero	Regina McAninch
Zero	Tracy Salyers

Zero Zero	Reba James Jennifer McDonald Antoinette Laskey	
PLAINTIFF TABITHA ABAIR		
We, the jury, further find tha to punitive damages - O follows:	t Plaintiff Tabitha Abair is entitled in the total amount of dollars against each defendant as	
Zero	Laurel Myers	
Zero	James Payne	
Zero	Regina McAninch	
Zero	Tracy Salyers	
Zero	Reba James	
Zero	Jennifer McDonald	
Zero	Antoinette Laskey	
PLAINTIFF KATELYNN SALYER		
entitled to punitive dam	that Plaintiff Katelynn Salyer is ages in the total amount of dollars against each defendant as	
Zero	Laurel Myers	
Zero	James Payne	
Zero	Regina McAninch	
Zero	Tracy Salyers	
Zero	Reba James	
Zero	Jennifer McDonald	

Zero		Antoinette Laskey
	PLAINTIFF	JOHNATHON ABAIR
	punitive dam	that Plaintiff, Johnathon Abair, is mages in the total amount of dollar against each defendant as
follows:		
Zero	2	Laurel Myers
Zero)	James Payne
Zero	<u> </u>	Regina McAninch
Zer	0	Tracy Salyers
2010)	Reba James
Zer	0	Jennifer McDonald
Zer	0	Antoinette Laskey

Your deliberations with respect to this case are now complete. The jury foreperson is to sign and date in the space provided.

DATED 10/6/15

FOREPERSON 15/ Jury Foreperson